

FISHER & PHILLIPS LLP
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487
 (602) 281-3400

Brian L. Bradford, NV Bar No. 9518
 FISHER & PHILLIPS LLP
 300 S. Fourth Street, Suite 1500
 Las Vegas, Nevada 89101
 Telephone: (702) 252-3131
 Fax: (702) 252-7411
 bbradford@fisherphillips.com

Pavneet Singh Uppal, AZ SBN 016805 (*Admitted Pro Hac Vice*)
 Kris Leonhardt, AZ SBN 026401 (*Admitted Pro Hac Vice*)
 FISHER & PHILLIPS LLP
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487
 Telephone: (602) 281-3400
 Fax: (602) 281-3401
 puppal@fisherphillips.com
 kleonhardt@fisherphillips.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
 MEMORIAL HOSPITAL, INC. (doing
 business as “Sage Memorial Hospital”); an
 Arizona non-profit corporation,

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,
 LLC; a Nevada limited liability company
 (doing business as “Razaghi Healthcare”), et
 al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**UNOPPOSED MOTION TO EXTEND
 TIME FOR DEFENDANTS’
 RESPONSE TO MOTION FOR LEAVE
 TO FILE FIRST AMENDED
 COMPLAINT PURSUANT TO RULE
 OF CIVIL PROCEDURE 15(a)(2) [ECF
 # 76]**

(First Request)

Defendants respectfully submit this unopposed motion for a short, one-week extension of
 time, up to and including **August 25, 2020**, for Defendants to answer or respond to Plaintiff’s
 Motion for Leave to File a First Amended Complaint Pursuant to Federal Rule of Civil Procedure
 15(a)(2) (ECF No. 76). Defendants make this request due to defense counsel’s current case load,

1 which includes but is not limited to, extensive pleading practice and discovery responses in the
 2 instant case as well as complex and demanding discovery in unrelated matters. The additional time
 3 requested herein will permit counsel for Defendants to meet other case commitments while
 4 addressing Plaintiff's Motion for Leave to File a First Amended Complaint Pursuant to Federal
 5 Rule of Civil Procedure 15(a)(2) (ECF No. 76). This is the first request to extend this deadline.

6 Plaintiff's counsel has confirmed via email that they do not oppose a one-week extension
 7 of the deadline.

8 RESPECTFULLY SUBMITTED this 17th day of August 2020.


9 FISHER & PHILLIPS LLP

10 By: /s/ Kris Leonhardt, Esq.

11 Brian L. Bradford, Esq.
 12 300 S. Fourth Street, Suite 1500
 13 Las Vegas, Nevada 89101

14 Pavneet Singh Uppal (*Admitted Pro Hac Vice*)
 15 Kris Leonhardt (*Admitted Pro Hac Vice*)
 16 FISHER & PHILLIPS LLP
 17 3200 N. Central Avenue, Suite 1550
 18 Phoenix, Arizona 85012-2487
 19 Attorneys for Defendants

20 IT IS SO ORDERED:

21 
 22 UNITED STATES MAGISTRATE JUDGE

23 Dated: August 18, 2020

FISHER & PHILLIPS LLP
 3200 N. Central Avenue, Suite 1550
 Phoenix, Arizona 85012-2487
 (602) 281-3400